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Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA AT ANCHORAGE

KIVALINA RELOCATION PLANNING )  
COMMITTEE, )

Plaintiff, )

v. )

TECK COMINCO ALASKA )  
INCORPORATED, )

Defendant. )

NANA Regional Corporation, Inc., )

Intervening Defendant. )

Case No. A02-231 CV (JWS)

DEFENDANT'S ANSWERS TO PLAINTIFF'S FIRST REQUEST FOR PRODUCTION

Defendant, TECK COMINCO ALASKA, INCORPORATED, hereby submits its  
answers to Plaintiff's First Request for Production as follows:

REQUEST FOR PRODUCTION NO. 1

Memo from Phyllis Scannell, ADF&G, to Alvin Ott, ADF&G, re NPDES field monitoring at  
Red Dog Mine, July 7, 1999. TC 004704-4710 RD.

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REQUEST FOR PRODUCTION NO. 4

Transmittal Letter from Alvin Ott, ADF&G, to Jim Kulas, Teck Cominco, re Red Dog Field Trip (August 5<sup>th</sup> to 16<sup>th</sup>, 1998, with enclosed report), September 9, 1998. TC 004720-4731 RD.

RESPONSE: The requested documents, bates numbers TC 004720-4731 RD, may be inspected on reasonable notice at the offices of Hartig Rhodes, Hoge & Lekisch, 717 K Street, Anchorage, Alaska 99501 and, at KRPC's request and expense, the documents may be copied.

REQUEST FOR PRODUCTION NO. 5

Terry Mudder and Mike Botz, report re Analytical and Environmental Issues Associated with Low Levels of Cyanide, April 2002 TC 004732-4861 RD.

RESPONSE: The requested documents, bates numbers TC 004732-4861 RD, may be inspected on reasonable notice at the offices of Hartig, Rhodes, Hoge & Lekisch, 717 K Street, Anchorage, Alaska 99501 and, at KRPC's request and expense, the documents may be copied.

REQUEST FOR PRODUCTION NO. 6

Phyllis Scannell and Alvin Ott, ADF&G report re Aquatic Biomonitoring at Red Dog Mine, 2000 NPDES permit, May 15, 2001. TC 004862 RD (71 Pages).

KRPC v. TCAK-Answers to Request  
for Production Set 1  
A02-231 CV (JWS)  
Page 3 of 8

RESPONSE: The requested document, bates number TC 004862 RD, may be inspected on reasonable notice at the offices of Hartig, Rhodes, Hoge & Lekisch, 717 K Street, Anchorage, Alaska 99501 and, at KRPC's request and expense, the document may be copied.

REQUEST FOR PRODUCTION NO. 7

Phyllis Scannell and Alvin Ott, ADF&G report re Aquatic Biomonitoring at Red Dog Mine, 2001 NPDES permit, May, 2002. TC 004863 RD (123 Pages).

RESPONSE: The requested document, bates number TC 004863 RD, may be inspected on reasonable notice at the offices of Hartig, Rhodes, Hoge & Lekisch, 717 K Street, Anchorage, Alaska 99501 and, at KRPC's request and expense, the document may be copied.

REQUEST FOR PRODUCTION NO. 8

Phyllis Scannell and Sally Anderson, ADF&G report re Aquatic Taxa Monitoring Study at Red Dog Mine, 1997-1998, November, 1999. TC 004864 RD (221 Pages).

RESPONSE: The requested document, bates number TC 004864 RD, may be inspected on reasonable notice at the offices of Hartig, Rhodes, Hoge & Lekisch, 717 K Street, Anchorage, Alaska 99501 and, at KRPC's request and expense, the document may be copied.

KRPC v. TCAK-Answers to Request  
for Production Set 1  
A02-231 CV (JWS)  
Page 4 of 8

on reasonable notice at the offices of Hartig, Rhodes, Hoge & Lekisch, 717 K Street, Anchorage, Alaska 99501 and, at KRPC's request and expense, the document may be copied.

REQUEST FOR PRODUCTION NO. 12

Phyllis Scannell and Alvin Ott, ADF&G report re Fishery Resources Below the Red Dog Mine Northwest Alaska 1990-1995, February 1996. TC 004868 RD (92 Pages).

RESPONSE: The requested document, bates number TC 004868 RD, may be inspected on reasonable notice at the offices of Hartig, Rhodes, Hoge & Lekisch, 717 K Street, Anchorage, Alaska 99501 and, at KRPC's request and expense, the document may be copied.

REQUEST FOR PRODUCTION NO. 13

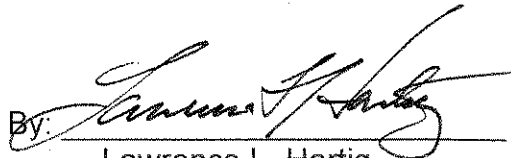
PND Inc., report re Red Dog Port Stormwater Improvements Precipitation and Runoff Analysis, March 1998. TC 004869 RD (114 Pages).

RESPONSE: The requested document, bates number TC 004869 RD, may be inspected on reasonable notice at the offices of Hartig, Rhodes, Hoge & Lekisch, 717 K Street, Anchorage, Alaska 99501 and, at KRPC's request and expense, the document may be copied.

**KRPC v. TCAK-Answers to Request  
for Production Set 1  
A02-231 CV (JWS)  
Page 6 of 8**

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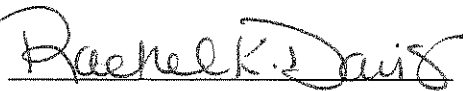
By:   
Robert J. Mahoney  
ABA 6711029

CERTIFICATE OF SERVICE

I certify that on the 12th day of May, 2003,  
a true and correct copy of the foregoing document  
and attachments were sent via U.S. mail, postage  
prepaid, to the following counsel of record:

Luke Cole  
Caroline Farrell  
Brent J. Newell  
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**KRPC v. TCAK-Answers to Request  
for Production Set 1  
A02-231 CV (JWS)  
Page 8 of 8**

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